

Commonwealth of Kentucky
Division for Air Quality
PERMIT STATEMENT OF BASIS

Title V No. V-98-043

RAYLOC - DIVISION OF GENUINE PARTS COMPANY
MORGANFIELD, KY.

June 2, 2000

STUART ECTON, B.S. CHEMICAL ENGINEER/ REVIEWER

Plant I.D. # 077-3900-0018

Application Log # F481

COMMENTS RECEIVED:

There were several comments received. All comments were made by Rayloc and their consultant, Environmental Resource Management. A copy of these comments are attached to this Statement of Basis. Please see ATTACHMENT A.

RESPONSE TO COMMENTS:

Comments 1 and 2.

Response: The dip tanks and spray booths mentioned in this and other comments are indeed exempt from Regulation 401 KAR 59:225, New miscellaneous metal parts and products surface coating operations and Regulation 401 KAR 61:132, Existing miscellaneous metal parts and products surface coating operations. They are exempt pursuant to section 2(1)(a) which states that "Each affected facility (paint booth, dip tank, etc.) commenced on or after the classification date defined in Section 1 of this administrative regulation **and** located in a county or portion of a county designated as nonattainment for ozone in 401 KAR 51:010, for any classification except marginal;....." Rayloc is located in Union county which is deemed to be an attainment county for ozone. It is for this reason the regulations do not apply to Rayloc and all references to and requirements from 59:225 and 61:132 have been removed from the permit.

Comments 3, 4 and 10.

Response: These affected facilities were omitted from the application in response to which this permit is being issued. These affected facilities are anti-rust, cleaning dip tanks and spray booths. These affected facilities have been added to the permit.

Comment 5.

Response: The affected facility in question is a metal parts degreaser. It is subject to Regulation 401 KAR 63:460, National emission standards for halogenated solvent cleaning (40 CFR 63 Subpart T). However, the Division also incorrectly listed Regulation 401 KAR 61:095, Existing metal cleaning equipment, as an applicable regulation. In fact, it is not applicable to this affected facility for the same reason 59:225 and 61:132 do not apply to the dip tanks and spray booths i.e. Rayloc is located in a county designated attainment for ozone and 61:095 does not apply in ozone attainment counties.

RESPONSE TO COMMENTS CONTINUED:

Comment 6, 8, and 9.

Response: The applicable regulation, 401 KAR 61:020, Existing process operations, clearly specifies the opacity limit to be 40% and not 20% as was listed in the draft permit for various emission points. These errors have been corrected.

Comment 11

Response: The additional Insignificant Activities that Rayloc requested to be included in the permit have been added to the list given in the draft permit.